

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF NEW MEXICO

STATE OF NEW MEXICO <i>ex rel.</i>)	
State Engineer, <i>et al.</i> ,)	
))	
) Plaintiffs,)	69cv07941-BB
)))	
) vs.)	RIO CHAMA ADJUDICATION
)))	
ROMAN ARAGON, <i>et al.</i> ,)	Canjilon Creek, Section 3
)))	
) Defendants.)	
)))	

MOTION TO JOIN ADDITIONAL PARTIES DEFENDANT

COMES NOW the Plaintiff State of New Mexico, *ex rel.* State Engineer (“State”) and respectfully requests the Court to join as additional parties the persons named below and order them to answer the State’s Complaint in this action as required in any civil action in the United State District Court or suffer default judgment against them. In support of this motion, the State asserts:

1. The persons listed below are diverting and using or may claim the right to divert and use surface or underground waters within the Rio Chama Stream System.

Alfredo J. Trujillo	CHCJ-004-0028	P.O. Box 563 Canjilon, NM 87515
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Mae C. Trujillo	CHCJ-004-0028	P.O. Box 563 Canjilon, NM 87515
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These waters belong to the public and are subject to appropriation in accordance with laws of the State of New Mexico. This Court has exclusive jurisdiction to adjudicate all claims to the right to divert, store, or use public waters of the Rio Chama Stream System.

2. The persons or entities listed above are in Section 3 of the Rio Chama Stream System, and may be diverting and using water associated with the subfile numbers listed, or may otherwise be using or diverting surface or underground waters within Section 3 of the Rio Chama Stream System.

Dated: September 21, 2007

Respectfully submitted,

/s/ Chris Lindeen
L. Christopher Lindeen
Special Assistant Attorney General
New Mexico Office of the State Engineer
P.O. Box 25102
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CERTIFICATE OF SERVICE

I certify that on the 21st day of September, 2007 I filed the foregoing electronically through the CM/ECF system and served the following non-CM/ECF participants in the manner indicated:

via first class mail, postage prepaid addressed as follows:

Alfredo J. Trujillo
Mae C. Trujillo
P.O. Box 563
Canjilon, NM 87515

/s/ Chris Lindeen
L. Christopher Lindeen